UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG RESOURCES (GUINEA) SARL, and BSG RESOURCES LIMITED,

Plaintiffs,

V.

GEORGE SOROS, OPEN SOCIETY
FOUNDATIONS, OPEN SOCIETY
INSTITUTE, FOUNDATION TO PROMOTE
OPEN SOCIETY, OPEN SOCIETY
FOUNDATION, INC., ALLIANCE FOR OPEN
SOCIETY INTERNATIONAL INC., OPEN
SOCIETY POLICY CENTER, and OPEN
SOCIETY FUND,

Defendants.

No. 1:17-cv-02726 (JFK) (AJP)

NOTICE OF APPLICATION FOR THE ISSUANCE OF A LETTER OF REQUEST (LETTER ROGATORY)

PLEASE TAKE NOTICE that upon the Application for the Issuance of a Letter of Request (Letter Rogatory) for the Production of Documents in the Republic of France Pursuant to the Hague Convention submitted by Defendants George Soros, Open Society Foundations, Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc., Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund (collectively, "Defendants"), and exhibits thereto, and all other papers and proceedings herein, Defendants will move this Court, before the Honorable Judge Andrew J. Peck, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order

issuing a Letter of Request to the Ministère de la Justice acting as the Central Authority of the Republic of France.

Dated: November 1, 2017 New York, New York Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

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